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District Counsel

IN THE UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF CALIFORNIA
FRESNO DIVISION

In re

TULARE LOCAL HEALTHCARE
DISTRICT, dba TULARE REGIONAL
MEDICAL CENTER,

Debtor.

Tax ID #: 94-6002897
Address: 869 N. Cherry Street
Tulare, CA 93274

CASE NO. 17-13797

Chapter 9

DC NO.: WW-16

Date: N/A
Time: N/A
Place: 2500 Tulare Street
Fresno, CA 93721
Courtroom 13
Judge: Honorable René Lastreto II

APPLICATION FOR EX PARTE ORDER AUTHORIZING FRBP 2004 EXAMINATION
AND PRODUCTION OF DOCUMENTS
(CELTIC LEASING CORP.)

TO THE HONORABLE RENÉ LASTRETO II, UNITED STATES BANKRUPTCY

JUDGE:

1 TULARE LOCAL HEALTHCARE DISTRICT, dba TULARE REGIONAL MEDICAL
2 CENTER ("TRMC" or "Applicant"), Debtor in the above captioned Chapter 9 bankruptcy
3 proceeding, hereby files this Application for Ex Parte Order compelling Celtic Leasing
4 Corp, to produce certain documents for inspection and copying and, if requested, to
5 appear for a FRBP 2004 Examination.

6
7 **Celtic Leasing Corp.**
8 **4 Park Plaza, Suite 300**
9 **Irvine, CA 92614**

10 Applicant represents as follows:

- 11 1. TRMC filed a voluntary Chapter 9 petition on September 30, 2017.
- 12 2. TRMC has reason to believe that Celtic Leasing Corp., is in possession of
13 information needed by TRMC which affects the rights of TRMC as well as the
14 administration of this bankruptcy estate.
- 15 3. TRMC believes that the information needed bears upon the acts,
16 conduct, or assets and liabilities of TRMC.
- 17 4. The examination will also relate to the operation of the TRMC's business
18 and the desirability of its continuance, the source of any money or property acquired or
19 to be acquired by TRMC for purposes of consummating a plan and the consideration
20 given or offered therefore, and any other matter relevant to the case or to the formation
21 of a plan.
- 22 5. Conducting such examination will assist TRMC in protecting its interests
23 in evaluating any plan that may be advanced and in furthering the administration of this
24 Chapter 9 proceeding.
- 25 6. By this Application TRMC requests that it be permitted to compel the
26 production of documentary evidence in the manner provided in FRBP 9016 followed by
27 an examination, if requested, of Celtic Leasing Corp.
- 28 7. By the requested Order Applicant will proceed to have issued a
Subpoena for Rule 2004 Examination with Production of Documents to be followed by

1 the examination of the witness, if documents are requested, no earlier than 10 days
2 after the date of issuance of the examination order or subpoena, whichever is later.

3 WHEREFORE, Applicant prays as follows:

4 A. The Court enter Order pursuant to FRBP 2004 authorizing the examination
5 of Celtic Leasing Corp.;


6 B. The Court enter an Order pursuant to FRBP 2004 authorizing the issuance
7 of a Subpoena for Rule 2004 Examination with Production of Documents; and

8 C. For such other and further relief as is just and proper.

9 Dated: December 13, 2017

WALTER WILHELM LAW GROUP,
a Professional Corporation

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12 By:


Riley C. Walter, Attorneys for Debtor,
Tulare Local Healthcare District, dba
Tulare Regional Medical Center